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TEXAS

September 19, 2012

Via ECF

Hon. Cathy L. Waldor, U.S.M.J.
United States District Court
M.L. King, Jr. Federal Bldg. & Courthouse
50 Walnut Street, Room 4040
Newark, NJ 7101

Re: Katalyst Beverage Corporation adv. Starco Impex, Inc., et al.
Civil Action No.: 10-5521 (JLL)(CLW)

Dear Judge Waldor:

We represent defendants Starco Impex, Inc. d/b/a Wholesale Outlet, USA Millennium GP, USA Millennium, LP, and M. Tahir Javed (the "Starco Defendants"). With the consent of counsel to plaintiff Katalyst Beverage Corporation, the Starco Defendants respectfully submit the attached proposed Discovery Confidentiality Order and Certification in Support of Proposed Discovery Confidentiality Order Pursuant to L. Civ. R. 5.3(b)(2) for Your Honor's consideration and entry.

The parties are available to discuss this matter in further detail at Your Honor's request.

Respectfully submitted,

/s/ David M. Kohane

David M. Kohane

DMK:ngm

cc: Robert Schoenberg, Esq. (via ECF and E-mail)
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